## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Norfolk Division

FAMILY DOLLAR, INC.,	§	
	§	
Plaintiff,	§	
	§	
<b>v.</b>	§ Case No.	
	§	
AMERICAN ARBITRATION	§	
ASSOCIATION, INC.,	§	
	§	
Defendant.	§	

## **COMPLAINT**

## **EXHIBIT E**

From: Beth Berman </O=DOLLARTREE/OU=EXCHANGE ADMINISTRATIVE GROUP

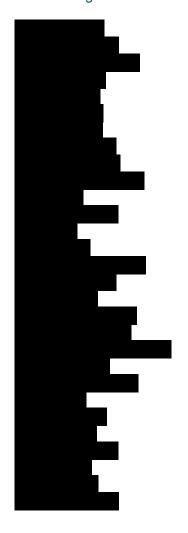
(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BBERMAN.DOLLARTREE.COM>

**Sent:** Friday, December 27, 2019 1:22 PM

**To:** AAA Heather Santo;

Cc:Elaine Hogan; Sara RafalSubject:RE: AAA claimants

The following 29 claimants have accepted settlement offers and will be withdrawing their arbitration demands. Accordingly, please remove them from the list of claimants. We anticipate more claimants will be withdrawing their demands in the next week or two. Thank you.



Respectfully,
Beth Hirsch Berman
Deputy General Counsel, Litigation
Dollar Tree
500 Volvo Parkway

Chesapeake, VA 23320 Direct Dial: (757) 321-5966 Fax Number: (757) 321-5949 bberman@dollartree.com

POOLLAR TREE FAMILY DOLLAR

Case 2:20 av 00249 AWA D.W. Document 1.5. Filed 05/15/20 Dage 2 of 4 DageID# 24
Case 2:20-cv-00248-AWA-RJK Document 1-5 Filed 05/15/20 Page 3 of 4 PageID# 24  From: AAA Heather Santo [mailto:heathersanto@adr.org]  Sent: Thursday, December 12, 2019 9:31 AM
To: Beth Berman
  dollartree.com>
Cc: Elaine Hogan <ehogan2@dollartree.com>; Sara Rafal <srafal@dollartree.com></srafal@dollartree.com></ehogan2@dollartree.com>
Subject: RE: AAA claimants
Dear Counsel,
This will confirm the demands for arbitration for an and an analysis have been withdrawn.
We will proceed with administration of the remaining 1,164 individual demands for arbitration upon receipt of Respondent's payment in the amount of \$2,560,800.00. Please mail your check to the American Arbitration Association at 13727 Noel Road, Suite 700, Dallas, TX 75240.
Please do not hesitate to contact me should you have any questions.
Sincerely,
Heather Santo
Heather Santo
American Arbitration Association
NPT's BEST
1301 Atwood Ave, Suite 211N, Johnston, RI 02919  NONPROFITS TOWORK FOR
T: 401 431 4703 F: 401 435 6529 E: heathersanto@adr.org
adr.org   icdr.org   aaamediation.org
The information in this transmittal (including attachments, if any) is privileged and/or confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this transmittal is prohibited except by or on behalf of the intended recipient. If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies of the transmittal. Thank you.
From:
Sent: Wednesday, December 11, 2019 8:07 PM
To: AAA Heather Santo < heathersanto@adr.org >
<b>Cc:</b> Elaine Hogan < <a href="mailto:ehogan2@dollartree.com">ehogan2@dollartree.com</a> >; Sara Rafal < <a href="mailto:srafal@dollartree.com">srafal@dollartree.com</a> >; Beth Berman < <a href="mailto:bberman@dollartree.com">bberman@dollartree.com</a> >;
Subject: RE: AAA claimants
*** External E-Mail – Use Caution ***
Ms. Santo,
is hereby withdrawing the demands for arbitration we filed on behalf of
Please let us know if you require any additional information to process the withdrawal.
Best,

From: Beth Berman < berman@dollartree.com > Sent: Wednesday, December 4, 2019 4:50 PM

cc: ; Elaine Hogan <<u>ehogan2@dollartree.com</u>>; Sara Rafal <<u>srafal@dollartree.com</u>>; AAA

Heather Santo < heathersanto@adr.org >

**Subject:** AAA claimants

To:

We identified the following additional claimants who are untimely. The last day each one worked was more than 3 years before the demands were filed. Accordingly, we would appreciate you asking AAA to remove them from the list of demands you sent to AAA last week.

Name Worked	Date Deman	d Served Terminatio	Termination Date Last Day	
	7/9/2019	8/18/2016	6/7/2016	
	9/20/2019	9/9/2016	8/4/2016	

Thank you

Respectfully,
Beth Hirsch Berman
Deputy General Counsel, Litigation
Dollar Tree
500 Volvo Parkway
Chesapeake, VA 23320
Direct Dial: (757) 321-5966
Fax Number: (757) 321-5949

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POOLLAR TREE FAMILY DOLLAR

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